

EXHIBIT P

WELDON & ROTHMAN
Personal Injury • Employment Law

2548 Northbrooke Plaza Drive
Tel: (239) 262-2141 • Fax: (239) 262-2342
WeldonRothman.com

June 20, 2022

**VIA E-MAIL (kim@kimwilhelm.com, ellenjo@ellenjowilhelm.com
sarah.p@finalexpensedirect.com, luis.beauchamp@finalexpensedirect.com)**

Final Expense Direct, Inc.
Attn: Kim Wilhelm, Owner
Ellen Jo Wilhelm, Co-owner
Sarah Premeux, Director of client relations
Luis Beauchamp, VP
6201 Bonhomme Rd.
Houston, TX 77036

RE: Python Leads, LLC

Dear Ms. Kim Wilhelm, Ms. Ellen Jo Wilhelm, Ms. Sarah Premeux, and Mr. Luis Beauchamp:

This firm serves as counsel for Python Leads, LLC (“Python”). We have been referred Final Expense Direct, Inc.’s (“FED”) demands for contribution from Python towards litigation settlement(s) and legal expense incurred by FED for TCPA liability allegedly associated with leads from Python. We have reviewed this matter, including but not limited to, the agreement, correspondence, and understandings between the parties regarding liability for TCPA claims. As set forth below, it is clear Python has no liability for this matter. FED’s demands are denied as without merit.

Specifically, the agreement between the parties, the Python Leads Agreement, expressly provides that Python assumes no responsibility for TCPA liability as follows:

Disclaimer:

. . . . And this is your responsibility to protect yourself against any cost, demands, or damages in regards to TCPA Rules. Python Leads will not be responsible for any loss or damage in regards to TCPA.

Consistent with the above agreement, on June 25, 2021, FED’s Vice-President of Marketing, Luis Beauchamp, e-mailed Python unambiguously confirming FED’s, and the parties’, understanding that FED is solely responsible for TCPA liability. In this e-mail, Mr. Beauchamp expressly acknowledged FED will be “100% liable for a TCPA claim.”

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Consistent with the above agreement and Mr. Beauchamp's express acknowledgment, on this same day, Python Head of Client Acquisitions, Ali Raza, explained in an e-mail to Mr. Beauchamp that, in the agreement between the parties, and as a condition of doing business with Python, FED "...will be responsible to protect [itself] in regards to TCPA." At no point did FED indicate any disagreement. There was no disagreement. FED assumed full responsibility for TCPA claims, expenses, and losses.

In light of the above, there can be no legitimate question that FED accepted full responsibility for TCPA liability, FED's demands of Python are wrongful, and Python has no obligation to FED whatsoever for any TCPA claims, expenses, or losses. FED's demands for contribution are therefore denied.

All further communications regarding TCPA liability should be directed to this firm, as Python's counsel. You should have no further communications with Ms. Levine or anyone else at Python regarding these matters.

Finally, please note that Python Invoice No. 120 for \$3,294.00 for live leads accepted and received by FED remains due and owing. A copy of this invoice is attached. The invoice should be paid directly to Python immediately. Please provide this office confirmation within seven (7) business days that this invoice has been paid.

Sincerely,

s/ Bradley P. Rothman

Bradley P. Rothman
Morgan Jones

BPR/mj
Enclosure
Cc: Client

INVOICE

120

Bill To:

FINAL EXPENSE DIRECT

Date: Apr 6, 2022

Due Date: Apr 6, 2022

Balance Due: \$3,294.00

Item	Quantity	Rate	Amount
FINAL EXPENSE LIVE LEADS	122	\$27.00	\$3,294.00

Subtotal: \$3,294.00

Tax (0%): \$0.00

Total: \$3,294.00

:

Notes: This invoice is from 28 March 2022- 30 March 2022

Python Leads
Wells Fargo
R: 063107513
A: 3498497282